## NEXSEN PRUET

August 28, 2007

Burnet R. Maybank, III Member Admitted in SC

## VIA ELECTRONIC FILING AND REGULAR MAIL

Public Service Commission
Docketing Department
P.O. Drawer 11649
101 Executive Center Drive
Columbia, South Carolina 29211

Re: Alltel Communications, Inc. ("Alltel"), Application for Designation as an Eligible Telecommunications Carrier ("ETC") – Alltel Proposed Order - Docket Number 2007-151-C

Dear Ladies and Gentlemen:

Charleston

Enclosed for filing please find an original and one (1) copy of Alltel Proposed Order in the above-referenced matter, together with a docket cover sheet.

Charlotte

Columbia

By copy of this letter, I am serving all parties of record with a copy of this Alltel Proposed Order as indicated on the attached Certificate of Service.

Greensboro

Greenville
Hilton Head

The enclosed document is an exact duplicate of the e-filed copy submitted to the Commission in accordance with its electronic filing instructions.

Myrtle Beach

Very truly yours,

Burnet R. Maybank, III

Enclosures BRM/sjn

cc: Nanette S. Edwards, Esq. All Parties of Record

#### Docket Number 2007-151-C

# Application of Alltel Communications, Inc. for Designation as an Eligible Telecommunications Carrier (ETC) in the State of South Carolina

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#### **CERTIFICATE OF SERVICE**

I, Shirley J. Neal, hereby certify that on this 28<sup>th</sup> day of August, 2007, a copy of **Alltel Proposed Order.** was placed in the United States mail, via first class, postage prepaid to:

C. Leslie Hammonds Office of Regulatory Post Office Box 11263 Columbia, SC 29211

Margaret M. Fox McNair Law Firm, P.A. Post Office Box 11390 Columbia, SC 29211

Scott Elliott Elliott & Elliott, P.a. 721 Olive Street Columbia, SC 29205

(Caption of Case) Application of Alltel Communicat Designation As An Eligible Telect Carrier Pursuant to Section 214(d) Communications Act of 1934	ions, Inc. for ) communications	PUBLIC SERVICE OF SOUTH COVER DOCKET NUMBER: 2005	C COMMISSION CAROLINA
(Please type or print)  Submitted by: Burnet R. Maybank III		SC Bar Number: 3699	
		Telephone: $\frac{803-771-8}{803-253}$	
Address: Nexsen Pruet, LLC		Fax: 803-253-8	3211
1441 Main Street, Suit	e 1500		
Columbia, SC 29201		Email: bmaybank@nexsenp	ruet.com
☐ Emergency Relief demanded in ☐ Other:	petition × ex	equest for item to be placed on peditiously	
INDUSTRY (Check one)		E OF ACTION (Check all th	
☐ Electric	Affidavit	<b>▼</b> Letter	Request
☐ Electric/Gas	Agreement	Memorandum	Request for Certification
☐ Electric/Telecommunications	Answer	Motion	Request for Investigation
Electric/Water	Appellate Review	Objection	Resale Agreement
Electric/Water/Telecom.	Application	Petition	Resale Amendment
Electric/Water/Sewer	Brief	Petition for Reconsideration	Reservation Letter
Gas	Certificate	Petition for Rulemaking	Response
Railroad	Comments	Petition for Rule to Show Cause	Response to Discovery
Railroad Sewer	Comments Complaint	Petition for Rule to Show Cause Petition to Intervene	Response to Discovery Return to Petition
Railroad Sewer Telecommunications	Comments Complaint Consent Order	Petition for Rule to Show Cause Petition to Intervene Petition to Intervene Out of Time	Response to Discovery Return to Petition Stipulation
☐ Railroad ☐ Sewer ☐ Telecommunications ☐ Transportation	Comments Complaint Consent Order Discovery	Petition for Rule to Show Cause Petition to Intervene Petition to Intervene Out of Time Prefiled Testimony	Response to Discovery Return to Petition Stipulation Subpoena
☐ Railroad ☐ Sewer ☐ Telecommunications ☐ Transportation ☐ Water	Comments Complaint Consent Order Discovery Exhibit	Petition for Rule to Show Cause Petition to Intervene Petition to Intervene Out of Time Prefiled Testimony Promotion	Response to Discovery Return to Petition Stipulation Subpoena Tariff
☐ Railroad ☐ Sewer ☐ Telecommunications ☐ Transportation ☐ Water ☐ Water/Sewer	Comments Complaint Consent Order Discovery Exhibit Expedited Consideration	Petition for Rule to Show Cause  Petition to Intervene  Petition to Intervene Out of Time  Prefiled Testimony  Promotion  Proposed Order	Response to Discovery Return to Petition Stipulation Subpoena
☐ Railroad ☐ Sewer ☐ Telecommunications ☐ Transportation ☐ Water ☐ Water/Sewer ☐ Administrative Matter	Comments Complaint Consent Order Discovery Exhibit Expedited Consideration Interconnection Agreement	Petition for Rule to Show Cause  Petition to Intervene  Petition to Intervene Out of Time  Prefiled Testimony  Promotion  Proposed Order  Protest	Response to Discovery Return to Petition Stipulation Subpoena Tariff
☐ Railroad ☐ Sewer ☐ Telecommunications ☐ Transportation ☐ Water ☐ Water/Sewer	Comments Complaint Consent Order Discovery Exhibit Expedited Consideration	Petition for Rule to Show Cause  Petition to Intervene  Petition to Intervene Out of Time  Prefiled Testimony  Promotion  Proposed Order  Protest	Response to Discovery Return to Petition Stipulation Subpoena Tariff

#### BEFORE THE PUBLIC SERVICE COMMISSION OF SOUTH CAROLINA

IN THE MATTER OF	)	
	)	Docket No. 2007-151-C
APPLICATION OF ALLTEL	)	
COMMUNICATIONS, INC. FOR	)	ALLTEL
DESIGNATION AS AN ELIGIBLE	)	PROPOSED ORDER
TELECOMMUNICATIONS CARRIER	)	
PURSUANT TO SECTION 214(e)(2) OF THE	)	
COMMUNICATIONS ACT OF 1934		

## INTRODUCTION AND JURISIDCTION

This matter is before the Public Service Commission of South Carolina (the "Commission") as a result of the Application of Alltel Communications, Inc. ("Alltel") for Designation as an Eligible Telecommunications Carrier ("ETC") pursuant to 47 U.S.C. § 214(e)(2). (the "Application").

Following Alltel's Application, the South Carolina Telephone Coalition ("SCTC") and United Telephone Company of the Carolinas d/b/a Embarq ("Embarq") sought and were granted intervention status. The Office of Regulatory Staff ("ORS") was a party pursuant to statute.

A public hearing was held at the Commission offices on July 11, 2007, with the Honorable G. O'Neal, Chairman, presiding. At hearing, Alltel was represented by Burnet R. Maybank, III, Esquire and Sean R. Simpson, Esquire. SCTC was represented by M. John Bowen, Esquire and Margaret M. Fox, Esquire. Embarq was represented by Scott Williott, Esquire and H. Edward Phillips, Esquire. ORS was represented by C. Leslie Hammonds, Esquire, Nanette Edwards, Esquire and Shealy Reibold, Esquire.

Pursuant to Section 254(e) of the 1996 Telecommunications Act (the "Act"), "only an eligible telecommunications carrier designated under section 214(e) shall be eligible to receive specific Federal universal service support. 47 U.S.C. § 254(e). To that end, Section 214(e)(2) of

the Act gives state commissions the primary responsibility for performing ETC designations. 47 U.S.C. § 214(e)(2).

Through the Application, Alltel seeks ETC designation as an ETC in order to receive support for the Federal Universal Service Fund ("USF") for use within Alltel designated ETC service area in South Carolina. Pursuant to 47 U.S.C. § 214(e)(2), the Commission has the necessary jurisdiction to designate Alltel as an ETC.

## **REQUIREMENTS FOR DESIGNATION**

The Commission may, with respect to an area served by a rural telephone company, and shall, in all other cases, designate more than one common carrier as an ETC for a designated service area, consistent with the public interest, convenience and necessity, so long as the requesting carrier meets the requirements of 47 U.S.C. § 214(e)(2). Accordingly, under section 214 of the Act and corresponding FCC rules, an ETC Application must demonstrate the following: (1) the applicant's capability and commitment to offer all services that are supported by the USF; (2) the capability and commitment to offer the supported services "using its own facilities or a combination of its own facilities and resale of another carrier's services"; (3) a description of how the applicant will "advertise the availability of the services and the charges therefore using media of general distribution"; and (4) a detailed description of the geographic service area for which it requests ETC designation from the Commission. 47 U.S.C. § 214(e)(2), 47 C.F.R. § 54.201(d).

#### **DISCUSSION**

#### A. Basic Qualifications

1. Offering the Services Designated for Support

Alltel has demonstrated though the required certifications and related filings that it, as a common carrier, currently offers, or will offer immediately upon designation as ETC, the services supported by the federal universal service mechanisms. (Hearing Tr. pp. 28-31). The testimony of Mr. Rohan Ranaraja clearly demonstrates that Alltel is licensed by the Federal Communications Commission ("FCC") to provide Commercial Mobile Radio Services ("CMRS") or wireless telecommunication services throughout the State of South Carolina for which it seeks ETC designation. (Hearing Tr. pp. 24, 33-35). Additionally, Alltel is able to offer and support the federally supported services utilizing its own facilities. (Hearing Tr. p. 6).

## 2. Advertising

Alltel has demonstrated that it currently advertises, and will continue to advertise post ETC designation, the supported services throughout its requested ETC service area through several different media, including newspaper, television, radio, print and billboard advertising. (Hearing Tr. p. 32). In addition, Alltel's internet site (www.alltel.com"), also contains detailed information regarding service offerings and is available 24-hours a day, 7-days a week. (Hearing Tr. p. 32). Finally, Alltel demonstrated that its various retail locations throughout the State also provide an additional source of advertising of the supported services. (Hearing Tr. p. 42).

With respect to its Lifeline and Link-up offerings Alltel demonstrated its ability and commitment to advertise the Lifeline and Link-up offerings on its Internet site, retail stores, local unemployment and Social Security offices and in state-wide and local newspapers. (hearing Tr.

The nine supported services include: (1) voice-grade access to the public switched telephone network; (2) local usage; (3) Dual tone multi-frequency ("DTMF") signaling or its functional equivalent; (4) Single-party service or its functional equivalent; (5) Access to emergency services; (6) Access to operator services; (7) Access to interexchange services; (7) Access to directory assistance; and (9) Toll limitation for qualifying low-income customers. 47 C.F.R. § 54.101(a)(1)-(9).

p. 32). Alltel committed to advertising the Lifeline and Link-up programs throughout its ETC designated service area upon designation. (Hearing Tr. p. 33). With respect to the actual Lifeline offering Alltel identified the price as \$16.70 per month for qualifying customers and \$1.00 for month for qualifying tribal customers. (Hearing Tr. p. 33).

No party introduced credible evidence refuting Alltel's capability and commitment to offer the supported services.

## B. Additional ETC Requirements

As further evidence of Alltel's ability and commitment to provide the supported services, Alltel demonstrated its compliance with additional ETC requirements identified in 47 C.F.R. § 54.202 and 54.209, which were recently adopted by this Commission to govern ETC designations on an interim basis.

#### 1. Commitment to Provide Service

Alltel has committed to offering and providing service in response to all reasonable requests for service pursuant to the six-step process set forth in 47 C.F.R. § 54.202(a). Furthermore, Alltel demonstrated that in the unlikely event that after following the process identified above it is unable to provide service, it will notify the requesting subscriber and the Commission for further discussion. (Hearing Tr. p. 36).

## 2. <u>Service Improvement Plan</u>

Alltel has committed to using the Federal Funds received as a result of its ETC designation only for the "provision, maintenance and upgrading of its facilities and services for which the support is intended." (Hearing Tr. p. 37). As evidence of its commitment, Alltel submitted a detailed network service improvement plan that demonstrated the appropriate use of support. Specifically, in reviewing the Alltel plan it is evident that the support received will be

invested in rural areas of South Carolina – Alltel will undertake 33 separate construction projects in the first year following ETC designation in order to enhance the wireless coverage enjoyed by South Carolina customers. (Hearing pp. 48-49 ) Furthermore, 18 construction projects undertaken by Alltel to establish or enhance wireless coverage will be done in wire centers with a population of less than 16,500 persons. (Hearing Tr. pp. 48-49). Finally, Alltel commits to 24 construction projects in the first year in wire centers with a population of less than 50,000 customers. (Hearing Tr. pp. 48-49). Alltel also committed to the annual submission of detailed progress reports on its service improvement plan in connection with this Commission's annual certification process. (Hearing Tr. p. 37).

Further, Alltel projects it will invest approximately \$7M to upgrade the switches that serve its ETC requested service area and approximately \$5M to upgrade existing cell sites within the ETC area in its first year of designation. (Hearing Tr, p. 49). As testified by Alltel's witness switch upgrades improve service and call quality by reducing the number of dropped and blocked calls and improves the network's reliability. (Hearing Tr, P. 49). Upgrades to existing cell sites can improve coverage through the addition of new antennas or improve service quality and increases the reliability of Alltel's network due to increased capacity at the cell site level. Alltel's witness also testified Alltel anticipates it will invest approximately \$750K in transport upgrades during the first year of designation. (Hearing Tr, p. 49). Transport upgrades include investments to connect new cell sites or upgrade facilities that connect existing cell sites to its switch and create network redundancies. Transport upgrades improve call quality and increases network reliability. Overall, Alltel projects it will invest approximately \$23.5M to expand and upgrade its South Carolina network in the first year of designation. (Hearing Tr, p. 49). Although not required to, it is significant that Alltel's anticipated investments will exceed its

anticipated universal service receipts in the first year of designation. The Commission believes that is a significant commitment by Alltel and will bring significant benefits to South Carolinians.

We also accept Alltel's initial service improvement plan as sufficient to support its ability and commitment to provide the supported services. We note that the level of detail in years 3-5 of the service improvement plan is appropriate in light of the speculative nature of investment decisions in years 3-5. We specifically reject SCTC's objection to the service improvement plan in favor of this Commission's ability to annually monitor and review the plan's progress and Alltel's continuing commitment. Through this process the Commission will be able to receive and adequately review reliable data, projections and information related to Alltel's appropriate use of support.

The SCTC stated that Alltel's Application failed to meet the Commission's criteria for designation as an ETC because Alltel did not provide a map depicting its existing coverage and how the proposed build out will improve coverage. Alltel's witness correctly pointed out that the FCC designation criteria does not require an Applicant to provide coverage maps as part of its Application but is only required to provide coverage maps as part of the annual certification filing. Hearing Tr, p. 84). Alltel's witness also stated that a coverage map depicting projected improvements are not reliable because of factors beyond the control of the company and that the only way to depict accurate coverage is to conduct signal readings after a facility is constructed and create a map based on such readings. (Hearing Tr. p. 85). The Commission, however, believes that a map depicting Alltel's existing wireless coverage will be useful to establish a

baseline to which future maps can be compared to. Therefore, the Commission will require Alltel to submit a coverage map depicting it existing coverage within 30 days of ETC designation.

## 3. Ability to Remain Functional in Emergency Situations.

Alltel has demonstrated that its network is designed to remain functional in emergency situations. Specifically, Alltel has demonstrated it has adequate amounts of back-up power to ensure functionality without an external power source, is able to reroute traffic around damaged facilities and is capable of managing traffic spikes resulting from emergency situations. (Hearing Tr. pp. 38-39). Alltel also reiterated its commitment to annually reviewing and certifying its emergency preparedness status. (Hearing Tr. p. 38). Alltel's witness also demonstrated in this testimony how the switch upgrades, upgrades to its existing cell sites and upgrades to its transport facilities described in its service improvement plan can increase the reliability of Alltel's network. (Hearing Tr, pp. 91, 94).

## 4. Satisfaction of Applicable Consumer Protection Standards.

In satisfaction of applicable consumer protection standards, Alltel has committed to annual compliance with the CTIA Consumer Code for Wireless Service. (Hearing Tr. p. 39). In addition, Alltel highlighted the competitive nature of the wireless market as further incentive for its consistent consumer satisfaction efforts. (Hearing Tr. p. 40). Finally, Alltel identified additional measures it has undertaken to improve customer satisfaction, including an automatic credit for dropped calls, flexible service offerings and consumer complaint response procedures. (Hearing Tr. p. 41). As evidence of its service quality commitment, we note that Alltel customer retention rate in the State of South Carolina is extremely good – only 1.27% of its subscribers switched to another wireless carrier in May of 2007. (Hearing Tr. p. 42).

#### 5. <u>Local Usage</u>

Alltel demonstrated that all of its service offerings are comparable to the incumbent offerings available in its requested ETC service area. (Hearing Tr. p. 42). We note that in reviewing comparable local usage plans, the FCC has NOT required comparable to mean identical. For example, the FCC has determined that when comparing a wireless ETC applicant's service offerings to those offered by the ILECs, it is appropriate to consider that the applicant may offer a local calling plan that has a different local calling area, that the applicant may offer an unlimited calling plan that bundles local with long distance calling or that the applicant may provide unlimited free calls to emergency and other services. In other words, the FCC considers the value afforded by the unique benefits and advantages of each applicant's services and features when evaluating comparability.

In a competitive market, consumers are able to consider many factors in making their determination of comparability between the services offered by competing ETCs. What constitutes value for one consumer may vary greatly from another. Thus, any attempt to determine the comparable value of different service offerings by a mathematical formula totally fails to consider the different market preferences and values that exist from one consumer to another. Today's competitive marketplace gives consumers the opportunity to choose a service offering or carrier that provides them the most value based on their individual preferences. The reality of today's market is that if a carrier does not provide value to a consumer, then the consumer will not purchase service from that carrier.

To that end, we find Alltel's service offerings are extremely competitive and provide consumer benefits that are not present in the ILECs' calling plans. For example, the Alltel service offerings provide the intrinsic benefit of mobility and larger local calling areas than the ILECs. In fact, all of Alltel's' currently marketed rate plans offer South Carolina subscribers a

minimum local calling area that includes the entire States of North and South Carolina and parts of Georgia. In addition, Alltel offers a variety of calling plans that bundle local and long distance calling, so the local calling area is, in effect, regionwide or nationwide. In addition, all of Alltel's service offerings include unlimited free calls to emergency services by calling 911, as well as unlimited free calling to customer care by dialing 611.

## 5. Equal Access Requirement

Alltel has acknowledged that the FCC may require it to provide equal access to interexchange services in the event that no other ETC is providing equal access within its ETC designated area. (Hearing Tr. p. 44). We find it significant to note that no party offered any evidence that Alltel's ETC designation would force an existing ETC to relinquish its ETC status.

#### C. <u>Public Interest</u>

As explained below, we find that it is consistent with the public interest, convenience and necessity to designate Alltel as an ETC for its requested ETC service area. Initially, we note that Alltel is not seeking redefinition of a rural telephone company study area so we are not obligated to undertake a redefinition analysis as encouraged by the FCC in matters involving redefinition requests.

Under section 214 of the Act, state commissions must determine that an ETC designation is consistent with the public interest, convenience and necessity. 47 U.S.C. §214(e)(2). Congress did not establish specific criteria to be applied under the public interest tests in section 214 or section 254. However, the FCC's March 17, 2005 Order addressing ETC designation criteria clearly addresses the appropriate public-interest analysis to be undertaken. *See In the* 

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Matter of Federal-State Joint Board on Universal Service, Report and Order, CC Docket No. 96-45, March 17, 2005. ("ETC Order"). Specifically the FCC provided that:

The public interests benefits of a particular ETC designation must be analyzed in a manner that is consistent with the purposes of the Act itself, including the fundamental goals of preserving and advancing universal service; ensuring the availability of quality telecommunication services at just, reasonable and affordable rates; and promoting the deployment of advanced telecommunications and information services to all regions of the nation, including rural and high-cost areas.

ETC Order, ¶ 40.

Beyond the principles articulated within the Act, the FCC identified additional factors to analyze whether the designation if an additional ETC is in the public interest. Other factors to consider on a fact-specific basis are: benefits of increased consumer choice and the unique advantages and disadvantages of the competitor's service offering. ETC Order, ¶ 41. In considering "consumer choice" the FCC stated that "granting an ETC designation may serve the public interest by providing a choice of service offerings in rural and high cost-areas. Likewise, in considering the "advantages of a particular service offering" the FCC examines "the benefits of mobility that wireless carriers provide in geographically isolated areas, the possibility that an ETC designation will allow customers to be subject to fewer toll charges and the potential for customers to obtain services comparable to those provided in urban areas, such as voicemail, numeric paging, call forwarding, three-way calling, call waiting and other premium services.

Furthermore, FCC contemplated that the additional designation/certification requirements it established in its ETC Order would help ensure that each ETC designation would serve the public interest. For example, the additional requirement of a service quality improvement plan (which Alltel has provided in this matter) and the commitment to respond to any reasonable

request for service (which Alltel has committed to in this matter) will benefit the public as a result of the designation of ETC applicants, like Alltel, that are committed to using high-cost support to alleviate poor service quality in the ETC's designated service area. *See* ETC Order, ¶ 45.

Finally, the FCC has specifically declined to adopt the proposal that would allow only one wireline and one wireless ETC in each service area. See ETC Order ¶ 57. Furthermore, the FCC rejected any presumption that it is not in the public interest to have more than one ETC in each rural high-cost area. Id.

Consistent with the FCC analysis of the issue, we note Alltel has demonstrated, and we now take note of, the numerous public interest benefits which will accrue to South Carolina consumers as a result of Alltel's designation, as follows:

- Increased consumer choice in rural areas of South Carolina not only
  provides increased service choices for rural South Carolinians but also
  encourages carrier innovation in products and services in order to attract
  and keep customers in a competitive market. (Hearing Tr. p. 169).
- Comparable services and quality between urban and rural areas of South Carolina. Although Alltel may offer the same types of rate plans and services throughout South Carolina, universal service support will allow Alltel to enhance its network in the rural areas of South Carolina to bring comparable service quality and network reliability to rural South Carolina. (Hearing Tr. pp. 172-173).

- Alltel's unique service plans offer larger local calling areas, thereby eliminating toll charges for a significant amount of calls. (Hearing Tr. p. 171).
- Expanded customer service support options/availability and technical support. (Hearing Tr, pp. 171-172).
- Access to a reliable state-of-the-art nationwide wireless network with advanced information/data services capability. (Hearing Tr, p. 172).
- Enhanced health and safety benefits from wireless service offerings.
   Citizens in rural areas depend on mobile phones for every cell site or network improvement that results from an ETC designation, reliability and performance of Alltel's network will improve, which in turn aids
   South Carolina consumers in critical times of need. (Hearing Tr. pp. 173-175).
- Economic development opportunities and benefits that result from access to wireless mobility and data services. (Hearing Tr, p. 171).
- wireless coverage will be done in wire centers with a population of less than 16,500 persons. (Hearing Tr. pp. 48-49). Alltel commits to 24 construction projects in the first year in wire centers with a population of less than 50,000 customers. (Hearing Tr. pp. 48-49). Alltel also committed to the annual submission of detailed progress reports on its service improvement plan in connection with this Commission's annual certification process. (Hearing Tr. p. 37).

On the other hand, no other party offered any credible evidence that Alltel's designation would frustrate the public interest of South Carolina or somehow work a public harm on the citizens of South Carolina. SCTC offered no evidence purporting to demonstrate that any of its companies would suffer harm as a result of Alltel designation. We also note that no SCTC witness proffered testimony that affected ILECs will curtail services, delay investments or go out of business as a result of Alltel's designation. To the contrary, both the Embarq and the ORS stated that they did not oppose Alltel's designation. Embarq further stated that it knows "with certainty" that Alltel has in fact used USF dollars to build out into un-served areas of other states. (Hearing Tr, p. 142).

We consider the growth in the federal fund to be minimal. Alltel estimates that its receipt of support will represent only a 0.5% impact on the federal fund based upon USAC projections for the third quarter of 2007. Moreover, given that fact that South Carolina consumers contribute approximately \$96 million per year in to the fund and draw \$0 for wireless network development, we believe any minimal amount of increase in the federal fund as a result of Alltel's commitment to South Carolina resulting from its designation is appropriate.

We conclude the designation of Alltel as an ETC throughout its requested ETC service area is within the public interest, convenience and necessity.

#### IT IS THEREFORE ORDERED THAT:

1. Alltel is designated as an ETC, as of the effective date of this Order, in the requested wire centers served by the non-rural telephone companies as identified in Exhibit 1.

- 2. Alltel is designated as an ETC, as of the effective date of this Order, in the requested study areas served by the rural telephone companies as also identified in Exhibit 1.
- 3. Alltel shall abide by the FCC's ETC designation criteria and rules set forth in 47 C.F.R. §§ 54.202, 54.209, consistent with the Commission's Directive issued May 30, 2007.
- 4. Alltel is required to submit a map depicting its current wireless coverage in the State of South Carolina within 30 days of the effective date of the Order.
- 5. Alltel shall abide by its commitment to provide the supported services throughout its ETC designated service to all customers making a reasonable request for service, including low-income customers.
- 6. All federal USF funding received as a result of this Order will be used solely for the provision, maintenance and upgrading of the facilities and services necessary to offer and advertise the federally supported services in high cost and rural areas and to provide lifeline credit for qualifying low-income consumers.
- 7. The Commission will file a certification with the FCC and the Universal Service Administrative Company within 60 days of the effective date of the Order, as required by 47 C.F.R. §§ 54.313 and 54.314, providing that Alltel will use federal high-cost support "only for the provision, upgrading and maintenance of facilities and services for which the support was intended."
- 8. This Order shall remain in full force and effect until further Order of the Commission.

BY ORDER OF THE COMMISSON:	
	G. O'Neil Hamilton, Chairman
ATTEST:	
C. Robert Moseley, Vice Chairman	
(SEAL)	